



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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Ref: Ref: 8EPR-N

Fort Carson NEPA Coordinator
Directorate of Environmental Compliance
and Management
1638 Elwell Street Building 6236
Fort Carson, Colorado 80913-4000

RE: Fort Carson Transformation FEIS
CEQ# 20070252

To Whom it May Concern:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) commented on the Fort Carson Transformation draft Environmental Impact Statement (DEIS) on January 3, 2007. The US Army Corps of Engineers (Corps) responded to our comments, and have made changes and additions to the final Environmental Impact Statement (FEIS). The Corps added or modified the following information to the FEIS:

- The Corps has addressed in the FEIS, EPA's concerns on the new EPA ammonia criteria by acknowledging Department of Defense will comply with any regulatory schedule imposed by EPA to meet the new permit discharge standards.
- The Corps has revised Section 3.7 of the FEIS to include a broader description of mitigation measures that will be implemented by the Army to protect wetland and riparian habitat on the base during the transformation construction period.
- The Corps has included in the FEIS its ongoing wildlife studies and monitoring programs that were not referenced or included in the DEIS.
- The Corps has included in the FEIS additional information on Fort Carson's voluntary air quality improvement programs.
- The Corps has provided additional information in the FEIS that provides greater detail of the existing traffic patterns and conditions, and looks at regional impacts to traffic that would occur in the implementation of the proposed alternative.
- The Corps has clarified in the FEIS why construction projects identified in the DEIS are now currently under construction. The FEIS explained that these construction activities

were covered under a February 2006 NEPA Environmental Assessment (EA), but are included in the EIS as part of the transformation action Army is undertaking.

- The Corp has added a discussion to the FEIS on what agency coordination occurred in the development of DEIS.
- The Corps has removed from the EIS's scope of work the installation of the underground communication line. This work has already undergone a NEPA analysis. The FEIS now includes the citation of the separate EA for this work.

EPA appreciates these changes to the FEIS and feels that they will contribute to a better analysis and in some cases a more environmentally-acceptable project. It is because of these changes we have changed our rating on the DEIS document from "2" (Insufficient Information) to "1" (Adequate) on the FEIS. However, EPA still believes this project will experience undetermined environmental impacts as troop levels increase at Fort Carson. It is important that a proactive approach is taken to assure compensation is available or is already occurred to address these impacts. Table 3-25 in the FEIS is a good first step in the development of procedures to reduce these future impacts. EPA would like to see a stronger mitigation plan developed that would better address environmental impacts both expected and those that may not be so easily foreseen. An example of this type of mitigation would be the development of a wetland mitigation bank that could be used as wetland credits with future project impacting wetlands drawing from these credits as they come on-line. Because of these uncertain impacts and how they will be mitigated we are retaining our rating on the environmental impact of the action to EC (Environmental Concerns)

I wish to thank you again for the time you gave my staff to tour Fort Carson. If you have any questions, please contact me at 303 312-6004 or the most knowledgeable person of my staff on this EIS, Dick Clark, at 303 312-6748.

Sincerely,

/s/ Deborah Lebow
for Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation